

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

|                            |   |                       |
|----------------------------|---|-----------------------|
| In re                      | ) |                       |
|                            | ) | Chapter 9             |
| CITY OF DETROIT, MICHIGAN, | ) |                       |
|                            | ) | Case No. 13-53846     |
|                            | ) |                       |
| Debtor.                    | ) | Hon. Steven W. Rhodes |
|                            | ) |                       |

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**NOTICE OF VIDEOTAPED DEPOSITION OF KEVYN D. ORR**

To: The City of Detroit, Michigan and Parties on the attached **Exhibit 1**.

**PLEASE TAKE NOTICE** that, pursuant to Federal Rules of Civil Procedure 26 and 30, made applicable to this proceeding by Federal Rules of Bankruptcy Procedure 7026 and 7030, and the Order Regarding Deposition Protocol [Doc. No. 5263], the parties set forth in **Exhibit 1**, attached hereto, by and through their attorneys of record, will take the deposition upon oral examination of **Kevyn D. Orr** at The Westin Book Cadillac, 1114 Washington Blvd, Detroit, Michigan 48226 on **Monday, July 21** and **Tuesday, July 22, 2014**. The COPs Objectors will take Mr. Orr's deposition on Monday, July 21, 2014, and the DWSD/County Objectors will take Mr. Orr's deposition on Tuesday, July 22, 2014. The deposition will begin at **9:00 a.m.** on both days, and continue until completed. Mr. Orr's deposition will be taken before a court reporter or other person authorized by law to administer oaths and provide an official record of the deposition. Mr. Orr's deposition will be recorded by stenograph and videotaped

for the purpose of discovery, for use in the above-titled action, and for any other purpose permitted under the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure.

Dated: June 17, 2014

Respectfully submitted,

**KIRKLAND & ELLIS LLP**

By: /s/ Stephen C. Hackney

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*Attorneys for Syncora Guarantee Inc. and  
Syncora Capital Assurance Inc.*

**EXHIBIT 1**

| Party  | Counsel for Party   |
|--|---|
| <i>Syncora Guarantee Inc. and<br/>Syncora Capital Assurance Inc.</i> | James H.M. Sprayregen, P.C.<br>Ryan Blaine Bennett<br>Stephen C. Hackney<br>KIRKLAND & ELLIS LLP<br>300 North LaSalle<br>Chicago, Illinois 60654<br>Telephone: (312) 862-2000<br>Facsimile: (312) 862-2200<br><br>- and -<br><br>Stephen M. Gross<br>David A. Agay<br>Joshua Gadharf<br>MCDONALD HOPKINS PLC<br>39533 Woodward Avenue<br>Bloomfield Hills, MI 48304<br>Telephone: (248) 646-5070<br>Facsimile: (248) 646-5075 |

| Party  | Counsel for Party  |
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| <p><i>Hypothesenbank Frankfurt AG;<br/>Hypothesenbank Frankfurt International<br/>S.A.; and Erste Europäische Pfandbrief-<br/>und Kommunalkreditbank<br/>Aktiengesellschaft in Luxemburg S.A..</i></p> | <p>Howard S. Sher<br/>JACOB &amp; WEINGARTEN, P.C.<br/>Somerset Place<br/>2301 W. Big Beaver Road, Suite 777<br/>Troy, Michigan 48084<br/>Tel: (248) 649-1200<br/>Fax: (248) 649-2920<br/>E-mail: <a href="mailto:howard@jacobweingarten.com">howard@jacobweingarten.com</a><br/><br/>-and-<br/><br/>Matthew G. Summers<br/>BALLARD SPAHR LLP<br/>919 North Market Street, 11th Floor<br/>Wilmington, Delaware 19801<br/>Tel: (302) 252-4428<br/>Fax: (410) 361-8930<br/>E-mail: <a href="mailto:summersm@ballardspahr.com">summersm@ballardspahr.com</a><br/><br/>-and-<br/><br/>Vincent J. Marriott, III, Esquire<br/>BALLARD SPAHR LLP<br/>1735 Market Street, 51st Flr.<br/>Philadelphia, PA 19103<br/>Phone: 215.864.8236<br/>Fax: 215.864.9762<br/>Email: <a href="mailto:marriott@ballardspahr.com">marriott@ballardspahr.com</a></p> |
| <p><i>Assured Guaranty Municipal Corp.</i></p>   | <p>Lawrence A. Larose<br/>Samuel S. Kohn<br/>Robert A. Schwinger<br/>CHADBOURNE &amp; PARKE LLP<br/>30 Rockefeller Plaza<br/>New York, NY 10112<br/>Telephone: (212) 408-5100<br/>Fax: (212) 541-5369<br/><a href="mailto:llarose@chadbourne.com">llarose@chadbourne.com</a><br/><a href="mailto:skohn@chadbourne.com">skohn@chadbourne.com</a><br/><a href="mailto:rschwinger@chadbourne.com">rschwinger@chadbourne.com</a></p>   |

| Party  | Counsel for Party  |
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| Party                                       | Counsel for Party   |
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| <p><i>U.S. Bank National Association, as<br/>Trustee for the Water and Sewer Bonds</i></p> | <p>David E. Lemke (TN13586)<br/> Paul S. Davidson (TN11789)<br/> Heather J. Hubbard (TN23699)<br/> WALLER LANSDEN DORTCH &amp;<br/> DAVIS, LLP<br/> 511 Union Street, Suite 2700<br/> Nashville, Tennessee 37219<br/> Phone: (615) 244-6380<br/> Fax: (615) 244-6804<br/> <br/> -and-<br/> <br/> Robert J. Diehl, Jr. (MI31264)<br/> Jaimee L. Witten (P70068)<br/> BODMAN PLC<br/> 1901 St. Antoine Street, 6th Floor<br/> Detroit, Michigan 48226<br/> Phone: (313) 393-7597<br/> Fax: (313) 393-7579</p> |



| Party   | Counsel for Party   |
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| <p><i>Detroit Fire Fighters Association,<br/>IAFF Local 344 and the<br/>Detroit Police Officers Association</i></p> | <p>Barbara A. Patek (P34666)<br/>Earle I. Erman (P24296)<br/>ERMAN, TEICHER, ZUCKER &amp;<br/>FREEDMAN, P.C.<br/>400 Galleria Officentre, Suite 444<br/>Southfield, MI 48034<br/>Telephone: (248) 827-4100<br/>Facsimile: (248) 827-4106<br/>E-mail: bpatek@ermanteicher.com</p> <p>-and-</p> <p>James M. Moore (P17929)<br/>GREGORY, MOORE, JEAKLE &amp;<br/>BROOKS, PC<br/>65 Cadillac Square, Suite 3727<br/>Detroit, MI 48226-2893<br/>Telephone: (313) 964-5600<br/>Facsimile: (313) 964-2125<br/>E-mail: jim@unionlaw.net</p> <p><i>Counsel for the DPOA</i></p> <p>-and-</p> <p>Christopher P. Legghio (P27378)<br/>Alidz Oshagan (P77231)<br/>LEGGHIO &amp; ISRAEL, PC<br/>306 S. Washington, Suite 600<br/>Royal Oak, MI 48067<br/>Telephone: 248 398 5900 x 1131<br/>Facsimile: 248 398 2662<br/>E-mail: CPL@legghioisrael.com</p> <p><i>Counsel for the DFFA</i></p> |

### **Certificate of Service**

I, Stephen C. Hackney, hereby certify that on June 17, 2014, I caused the foregoing *Notice of Videotaped Deposition of Kevyn D. Orr* to be filed and served via the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this matter.

/s/ Stephen C. Hackney

Stephen C. Hackney